



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

N62578.AR.000897
NCBC DAVISVILLE
5090.3a

June 13, 1997

Mr. Philip Otis
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Re: Review of Site 7 Draft Proposed Plan (PP), Former Naval Construction Battalion Center,
Davisville, RI

Dear Mr. Otis:

Pursuant to § 7.6(g) of the NCBC Federal Facility Agreement (FFA), the Environmental Protection Agency (EPA) has reviewed the subject document and comments are enclosed.

The Navy has not yet fulfilled the requirement for the remedial investigation (RI) to be complete prior to the start of the public comment period because the Navy has not yet produced a final RI/FS at this time. EPA is reviewing the Interim RTC and expects to provide comments prior to June 27, 1997.

EPA cannot concur with the Navy's proposal of Institutional Controls until the administrative record for this operable unit (OU) is complete. The administrative record for the OU will not be complete until the Navy submits a final RI/FS. We request a schedule as to when the revised RI/FS will be submitted, after consideration of our comments.

Please be advised that the RI for these OUs will not be considered complete until the Navy submits final RI/FS which are satisfactory to EPA. The complete administrative record for this OU must be available for public review and comment at the time the PP is issued. Since the current FFA schedule requires the Navy to submit a draft final ROD with responsiveness summary by September 14, 1997, these documents should have already been submitted to EPA for review.

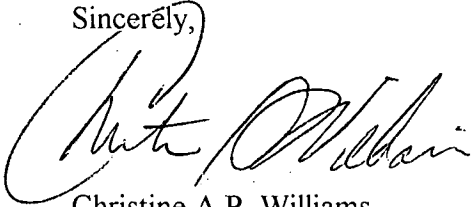
Accordingly, EPA does not approve the issuance of the PP for the whole site OU for Site 07, until the RI/FS have been finalized and approved by EPA.



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We look forward to completing this OU within the agreed to schedule. Please call me if you have any questions concerning this letter at (617) 573-5736.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine Williams", written in dark ink.

Christine A.P. Williams,
Remedial Project Manager
Federal Facilities Superfund Section

Enclosure

cc: Richard Gottlieb, RIDEM
Walter Davis, NCBC
Bill Brandon, EPA
Jayne Michaud, EPA
Sarah White, EPA
Marilyn Cohen, ToNK
Howard Cohen, RIEDC
Marjory Myers, Narragansett Tribe
Bryan Wolfenden, RI RC&DC
George Horvat, Dynamac
Jim Shultz, EA

EPA Review of Draft Proposed Plan for Site 7

1. Page 1, column 1, last sentence. Insert a reference to the shaded box for clarity, such as: "This Proposed Plan summarizes the Navy's preferred alternative of **Institutional Controls** (see shaded box) for the Site 7 remedy."
2. Add an index or table of contents box on the front page (lower right).
3. Page 1, top of column 2. The PP should address concerns of the use of groundwater and the migration to surface water. Change the sentence to read, "This Proposed Plan addresses concerns that the conditions at Site 07 pose an unacceptable risk to human health based on the potential for future ingestion or use of affected ground water and the potential for future risk to human health and the environment from the migration of contaminated ground water to surface water."
4. Page 1, column 2, shaded box. The PP summary should also include surface water and sediment sampling and annual meetings to update the public on the results of the monitoring program.
5. Page 1, column 2, shaded box. Change the bullet "5-year reviews" to "Navy, EPA & RIDEM 5-year reviews" to assure the public that the BCT will continue to evaluate the performance of the remedy and not leave this evaluation to the ToNK.
6. Page 1, column 2, second bullet. Remove the words "semi-annual" and the words within the parenthesis. The bullet should state, "Monitoring of selected upgradient, downgradient, and side-gradient ground-water monitoring wells and sediments and surface water at the ground water discharge points to monitor the extent of the ground water plume over time; and"
7. Page 2, column 1. Add a bullet. "Annual meetings to update the public on the results of the LTMP."
8. In box on documents are available for review change to **Where you can go to review documents...**
9. Page 3, Column 1. Under site history, page 3 last paragraph first column, insert "as shown in" (as shown in figure 1)
10. Page 3, column 2. Boldface significant dates on time line **between 1960 and 1974**, also do separate bullet for 1978 and 1982
11. Page 3, column 2. Put comma after thirty to forty, 35-gallon...
12. Page 4, top of column 1. The Navy has stated previously that there have been no records discovered of exacting the size or the type of containers disposed of at the site. Change the

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sentence to read, "At some time between 1968 and 1974, a trench measuring approximately 10 ft x 20ft x 15 ft was purportedly filed with approximately the equivalent of 2500 3-gal cans which contained "Decontaminating Agent Non-Corrosive"(DANC) solution."

13. Page 5, column 2. Results of field investigation, Geology- consider replacing text with a cross section graphic

14. Same cross section could be used to describe hydrology zones. Diagrams referred to as figure 4-6 too hard for the general public to read.

15. Pages 6-13. Rather than the wordy text on these pages, the Navy should put together several tables. As a reader this is the most important bit of info you can give me (process and method are secondary).

The first should be similar to the following:

RESULTS OF INVESTIGATIONS

	Chlorinated VOC	SVOC/Pest/ PCB	Metals and Salts
Groundwater	√		√
Soils	trace		trace
Sediments		√	√
Surface water			√
Shellfish Tissue		√	√

with a note that the results of the sediment/surface water/shellfish tissue investigations indicated that the SVOC/Pest/PCB results are from other Navy/public sources within the Allen Harbor.
Spell out VOC & SVOC & PCB

The second table should be similar to the following:

RISKS to HUMAN HEALTH

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Exposure Scenarios Evaluated	ground water ingestion	inhalation of VOC during showering	dermal contact with ground water during showering	incidental ingestion of sediments or soils	dermal contact with sediments or soils	shell fish ingestion
residential populations	√					
recreational populations		√	√			√
future construction/remediation worker populations						

√ = unacceptable cancer risks (above 1 in 10,000) and unacceptable non-cancer risks (above threshold value of 1)

with a note that the site source related risks are due to the use of groundwater and that the risks from eating shell fish are due to other Navy/public sources in the Allen Harbor.

The third table should be similar to the following:

ECOLOGICAL RISKS

	Chlorinated VOCs	SVOC/Pest/PCBs	Metals
terrestrial receptors		√	√
marine receptors		√	√

with a note that there are no site source related risks to the ecological receptors and the existing risks are due to other Navy/public sources in the Allen Harbor.

The fourth table would be similar to the following:

COMPARISON OF ALTERNATIVES

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	No Action	Institutional Controls	Anaerobic Bio-degradation	Re-circulating Wells	Permeable Reaction Wall
Protection of Human Health		✓	✓	✓	✓
Compliance with ARARs					
Long-Term Effectiveness and Permanence		✓	✓	✓	✓
Reduction of Toxicity, Mobility or Volume through Treatment			✓	✓	✓
Short-Term Effectiveness		✓	✓	✓	✓
Implementability	✓	✓	✓	✓	✓
Cost		93,000+(30x 23,800)= \$807,000	\$2,266,000	\$3,492,000	\$7,837,000
Support Agency Concurrence		✓			
Community Concurrence *					

* to be solicited during the public comment period

✓ = partially meet criteria

✓ = meet criteria

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With the note that the none of the alternatives will comply with ARARs because none will remediate site ground water below regulatory standards.

16. The text which describes the various alternatives should be kept, pp10-12, as should the Rationale for the Proposed Remedial Alternative section with the previously noted changes to the monitoring program (include sediment and surface water and remove "semi-annual") and the annual public meetings.

17. Page 14, column 2. Under important dates. Insert: **refer to page 2 for details** under dates

18. On top of figure clarify what reader is looking at. Identify clearly what figure is of. Calf Pasture point should be labeled on all figures.

19. Please **SHADE** zone 7 in figure 1 for clarity to the reader.